

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Petition to Revoke Probation
Against:

**GLYNN MARIE PEAKE, aka
GLYNN MARIE ZUANICH**

Registered Nurse License No. 452568

Respondent

Case No. 2011-88

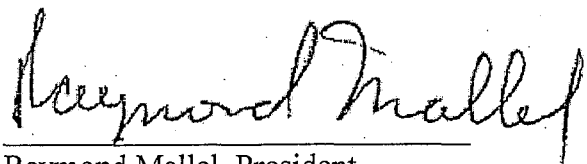
OAH No. L-2010110244

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **August 30, 2012.**

IT IS SO ORDERED **July 31, 2012.**



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3 GEOFFREY WARD
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Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Petition to Revoke
11 Probation Against:

12 **GLYNN MARIE PEAKE AKA GLYNN**
13 **MARIE ZUANICH**

14 **2126 Mt. Shasta Drive**
San Pedro, CA 90732

15 **Registered Nurse License No. 452568**

16 Respondent.

Case No. 2011-88

OAH No. L-2010110244

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Louise R. Bailey, M.Ed., R.N. (Complainant) is the Executive Officer of the Board of
22 Registered Nursing. She brought this action solely in her official capacity and is represented in
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Geoffrey Ward,
24 Deputy Attorney General.

25 2. Respondent Glynn Marie Peake aka Glynn Marie Zuanich (Respondent) is
26 representing herself in this proceeding and has chosen not to exercise her right to be represented
27 by counsel.
28

3. On or about March 31, 1990, the Board of Registered Nursing issued Registered Nurse License No. 452568 to Glynn Marie Zuanich, aka Glynn Marie Peake (Respondent). The Registered Nurse License was in full force and effect at all times relevant to the charges brought in Accusation No. 2011-88 and will expire on March 31, 2014, unless renewed.

4. In a disciplinary action entitled "In the Matter of Accusation Against In the Matter of Glynn Marie Zuanich aka Glynn Marie Peake," Case No. 2011-88, the Board of Registered Nursing, issued a decision, effective September 21, 2011, in which Respondent's Registered Nurse License was revoked. However, the revocation was stayed and Respondent's Registered Nurse License was placed on probation for a period of three years with certain terms and conditions. A copy of the Board's decision in that matter, which includes the probationary terms and conditions is attached as Exhibit A and incorporated by reference.

JURISDICTION

5. Petition to Revoke Probation No. 2011-88 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Petition and all other statutorily required documents were properly served on Respondent on December 6, 2011. Respondent timely filed her Notice of Defense contesting the Petition. A copy of Petition No. 2011-88 is attached as exhibit B and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, and understands the charges and allegations in Petition No. 2011-88. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Petition; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent admits that on or about October 10, 2011 at a random biological fluid test, Respondent tested positive for alcohol consumption due to the consumption of over-the-counter medication used to treat complications arising from a recent surgical procedure. Although this product was used to treat a medical condition, the use of a product containing alcohol without a physician's prescription was a violation of the terms of her probation, which required her to abstain from the use of alcohol.

10. Respondent agrees that her Registered Nurse License is subject to discipline and agrees to comply with the Board of Registered Nursing's probationary terms as set forth in the Board's September 2011 decision, attached as Exhibit A, as modified by the Disciplinary Order below.

CONTINGENCY

11. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 452568 issued to Respondent Glynn Marie Peake shall remain on probation as set forth in the Board's September 2011 decision and order, attached as Exhibit A. This probation shall continue for 3 years from the effective date of that decision and order. Respondent may continue the practice of nursing during the period of that probation and shall continue to comply with all of that decision's probationary terms and conditions, including obtaining prior approval from the Board before commencing or continuing any employment as a registered nurse as required by condition 7 of the decision and refraining from the consumption or use of alcohol or controlled substances as required by condition 15 of the decision.

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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this

Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED:

1/26/2012

Glynn Marie Peake
GLYNN MARIE PEAKE,
aka GLYNN MARIE ZUANICH
Respondent

ENDORSEMENT

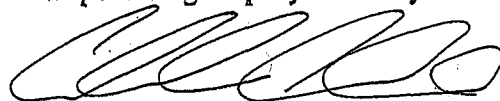
The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

1/27/12

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
KAREN B. CHAPPELLE
Supervising Deputy Attorney General



GEOFFREY WARD
Deputy Attorney General
Attorneys for Complainant

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1 KAMALA D. HARRIS
Attorney General of California
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Supervising Deputy Attorney General
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6 Facsimile: (213) 897-2804
E-mail: Geoffrey.Ward@doj.ca.gov
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Petition to Revoke
13 Probation Against,

Case No. 2011-88

14 **GLYNN MARIE PEAKE, AKA GLYNN**
15 **MARIE ZUANICH**
2126 Mt. Shasta Drive
16 San Pedro, CA 90732
Registered Nurse License No. 452568

PETITION TO REVOKE PROBATION

Respondent.

17 Complainant alleges:

18 PARTIES

19 1. Louise R. Bailey, M.Ed., R.N. (Complainant) brings this Petition to Revoke Probation
20 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,
21 Department of Consumer Affairs.

22 2. On or about March 31, 1990, the Board of Registered Nursing issued Registered
23 Nurse License Number 452568 to Glynn Marie Peake, aka Glynn Marie Zuanich (Respondent).
24 The Registered Nurse License was in effect at all times relevant to the charges brought herein and
25 will expire on March 31, 2012, unless renewed.

26 3. In a disciplinary action entitled "In the Matter of Accusation Against In the Matter of
27 Glynn Marie Zuanich aka Glynn Marie Peake," Case No. 2011-88, the Board of Registered
28 Nursing, issued a decision, effective September 21, 2011, in which Respondent's Registered

1 Nurse License was revoked. However, the revocation was stayed and Respondent's Registered
2 Nurse License was placed on probation for a period of three (3) years with certain terms and
3 conditions. A copy of that decision and order is attached as Exhibit A and is incorporated by
4 reference.

5 JURISDICTION

6 4. This Petition to Revoke Probation is brought before the Board of Registered Nursing
7 (Board), Department of Consumer Affairs, under the authority of the following laws. All section
8 references are to the Business and Professions Code unless otherwise indicated.

9 5. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part,
10 that the Board may discipline any licensee, including a licensee holding a temporary or an
11 inactive license, for any reason provided in Article 3 (commencing with section 2750) of the
12 Nursing Practice Act.

13 6. Section 2764 of the Code provides, in pertinent part, that the expiration of a license
14 shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the
15 licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the
16 Code, the Board may renew an expired license at any time within eight years after the expiration.

17 FIRST CAUSE TO REVOKE PROBATION

18 (Failure to Abstain from Consumption of Alcohol)

19 7. Respondent's probation is subject to revocation because she failed to comply with the
20 terms and conditions of the disciplinary order imposing probationary terms and conditions on her
21 license when she failed to abstain from the consumption of alcohol. The facts and circumstances
22 regarding this violation are as follows:

23 8. At all times after the effective date of Respondent's probation, Condition 2 of the
24 Board's disciplinary order stated:

25 **"Comply with the Board's Probation Program.** Respondent shall fully
26 comply with the conditions of the Probation Program established by the Board and
27 cooperate with representatives of the Board in its monitoring and investigation of the
28 Respondent's compliance with the Board's Probation Program. Respondent shall
inform the Board in writing within no more than 15 days of any address change and
shall at all times maintain an active, current license status with the Board, including
during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully restored."

9. At all times after the effective date of Respondent's probation, Condition 12 of the Board's disciplinary order stated:

“Violation of Probation. If Respondent violates the conditions of her probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent’s license.

If during the period of probation, an accusation or petition to revoke probation has been filed against Respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against Respondent's license, the probationary period shall automatically be extended and shall not expire until the accusation or petition has been acted upon by the Board."

10. At all times after the effective date of Respondent's probation, Condition 16 of the Board's disciplinary order stated in relevant part:

"Abstain from Use of Psychotropic (Mood-Altering) Drugs.
Respondent shall completely abstain from the possession, injection or consumption by any route of all controlled substances and all psychotropic (mood altering) drugs, including alcohol, except when the same are ordered by a health care professional legally authorized to do so as part of her medical treatment."

11. At all times after the effective date of Respondent's probation, Condition 17 of the Board's disciplinary order stated in relevant part:

"Submit to Tests and Samples. Respondent, at her expense, shall participate in a random, biological fluid testing or a drug screening program which the Board approves. The length of time and frequency will be subject to approval by the Board. Respondent is responsible for keeping the Board informed of Respondent's current telephone number at all times. Respondent shall also ensure that messages may be left at the telephone number when she is not available and ensure that reports are submitted directly by the testing agency to the Board, as directed. Any confirmed positive finding shall be reported immediately to the Board by the program and Respondent shall be considered in violation of probation."

12. On or about October 10, 2011 at a random biological fluid test, Respondent tested positive for alcohol consumption, showing that she had failed to abstain from alcohol consumption during the period of her probation. The consumption of alcohol violated Condition 16 of the disciplinary order, which subjects her license to the previously stayed revocation under Conditions 2 and 12 of the disciplinary order.

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Exhibit A

**Decision and Order of the Board of Registered Nursing *In the Matter of Accusation Against
In the Matter of Glynn Marie Zuanich aka Glynn Marie Peake* Case No. 2011-88**

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

GLYNN MARIE ZUANICH, AKA
GLYNN MARIE PEAKE

Registered Nurse License No. 452568

Respondent

Case No. 2011-88

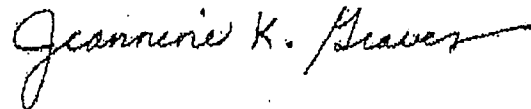
OAH No. L-2010110244

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in the above entitled matter.

This Decision shall become effective on **September 21, 2011**.

IT IS SO ORDERED **August 22, 2011**.



President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1. KAMALA D. HARRIS
Attorney General of California
2. KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3. GEOFFREY WARD
Deputy Attorney General
4. State Bar No. 246437
300 So. Spring Street, Suite 1702
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Telephone: (213) 897-2660
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Attorneys for Complainant

7
8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2011-88

13 **GLYNN MARIE ZUANICH, AKA GLYNN**
14 **MARIE PEAKE**

OAH No. L-2010110244

15 **2126 Mt. Shasta Drive**
16 **San Pedro, CA 90732**

17 **STIPULATED SETTLEMENT AND**
18 **DISCIPLINARY ORDER**

19 **Registered Nurse License No. 452568**

20 **Respondent.**

21 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
22 entitled proceedings that the following matters are true:

23 **PARTIES**

24 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
25 Registered Nursing. She brought this action solely in her official capacity and is represented in
26 this matter by Kamala D. Harris, Attorney General of the State of California, by Geoffrey Ward,
27 Deputy Attorney General.

28 2. Respondent Glynn Marie Zuanich, aka Glynn Marie Peake (Respondent) is
representing herself in this proceeding and has chosen not to exercise her right to be represented
by counsel.

STIPULATED SETTLEMENT (2011-88)

1 3. On or about March 31, 1990, the Board of Registered Nursing issued Registered
2 Nurse License No. 452568 to Glynn Marie Zuanich, aka Glynn Marie Peake (Respondent). The
3 Registered Nurse License was in full force and effect at all times relevant to the charges brought
4 in Accusation No. 2011-88 and will expire on March 31, 2012, unless renewed.

5 JURISDICTION

6 4. Accusation No. 2011-88 was filed before the Board of Registered Nursing (Board),
7 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation
8 and all other statutorily required documents were properly served on Respondent on August 4,
9 2010. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of
10 Accusation No. 2011-88 is attached as exhibit A and incorporated herein by reference.

11 ADVISEMENT AND WAIVERS

12 5. Respondent has carefully read, and understands the charges and allegations in
13 Accusation No. 2011-88. Respondent has also carefully read, and understands the effects of this
14 Stipulated Settlement and Disciplinary Order.

15 6. Respondent is fully aware of her legal rights in this matter, including the right to a
16 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
17 her own expense; the right to confront and cross-examine the witnesses against her; the right to
18 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
19 compel the attendance of witnesses and the production of documents; the right to reconsideration
20 and court review of an adverse decision; and all other rights accorded by the California
21 Administrative Procedure Act and other applicable laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
23 every right set forth above.

24 CULPABILITY

25 8. Respondent admits the truth of each and every charge and allegation in Accusation
26 No. 2011-88.

1 9. Respondent agrees that her Registered Nurse License is subject to discipline and she
2 agrees to be bound by the Board of Registered Nursing's probationary terms as set forth in the
3 Disciplinary Order below.

4 CIRCUMSTANCES IN MITIGATION

5 10. Respondent Glynn Marie Zuanich, aka Glynn Marie Peake has never been the subject
6 of any disciplinary action in California. She is admitting responsibility at an early stage in the
7 proceedings.

8 CONTINGENCY

9 11. This stipulation shall be subject to approval by the Board of Registered Nursing.
10 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
11 Registered Nursing may communicate directly with the Board regarding this stipulation and
12 settlement, without notice to or participation by Respondent. By signing the stipulation,
13 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind
14 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
15 this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall
16 be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
17 between the parties, and the Board shall not be disqualified from further action by having
18 considered this matter:

19 12. The parties understand and agree that facsimile copies of this Stipulated Settlement
20 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
21 effect as the originals.

22 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
23 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
24 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
25 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
26 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
27 writing executed by an authorized representative of each of the parties.
28

1 14. In consideration of the foregoing admissions and stipulations, the parties agree that
2 the Board may, without further notice or formal proceeding, issue and enter the following
3 Disciplinary Order:

4 **DISCIPLINARY ORDER**

5 IT IS HEREBY ORDERED that Registered Nurse License No. 452568 issued to
6 Respondent Glynn Marie Zuanich, aka Glynn Marie Peake (Respondent) is revoked. However,
7 the revocation is stayed and Respondent is placed on probation for three (3) years on the
8 following terms and conditions.

9 **Severability Clause.** Each condition of probation contained herein is a separate and
10 distinct condition. If any condition of this Order, or any application thereof, is declared
11 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
12 applications thereof, shall not be affected. Each condition of this Order shall separately be valid
13 and enforceable to the fullest extent permitted by law.

14 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A
15 full and detailed account of any and all violations of law shall be reported by Respondent to the
16 Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
17 compliance with this condition, Respondent shall submit completed fingerprint forms and
18 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
19 as part of the licensure application process.

20 **Criminal Court Orders:** If Respondent is under criminal court orders, including
21 probation or parole, and the order is violated, this shall be deemed a violation of these probation
22 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

23 2. **Comply with the Board's Probation Program.** Respondent shall fully
24 comply with the conditions of the Probation Program established by the Board and cooperate with
25 representatives of the Board in its monitoring and investigation of the Respondent's compliance
26 with the Board's Probation Program. Respondent shall inform the Board in writing within no
27 more than 15 days of any address change and shall at all times maintain an active, current license
28 status with the Board, including during any period of suspension.

1 Upon successful completion of probation, Respondent's license shall be fully restored.

2 3. **Report in Person.** Respondent, during the period of probation, shall
3 appear in person at interviews/meetings as directed by the Board or its designated representatives.

4 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency
5 or practice as a registered nurse outside of California shall not apply toward a reduction of this
6 probation time period. Respondent's probation is tolled, if and when she resides outside of
7 California. Respondent must provide written notice to the Board within 15 days of any change of
8 residency or practice outside the state, and within 30 days prior to re-establishing residency or
9 returning to practice in this state.

10 Respondent shall provide a list of all states and territories where she has ever been licensed
11 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide
12 information regarding the status of each license and any changes in such license status during the
13 term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing
14 license during the term of probation.

15 5. **Submit Written Reports.** Respondent, during the period of probation,
16 shall submit or cause to be submitted such written reports/declarations and verification of actions
17 under penalty of perjury, as required by the Board. These reports/declarations shall contain
18 statements relative to Respondent's compliance with all the conditions of the Board's Probation
19 Program. Respondent shall immediately execute all release of information forms as may be
20 required by the Board or its representatives.

21 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every
22 state and territory in which she has a registered nurse license.

23 6. **Function as a Registered Nurse.** Respondent, during the period of
24 probation, shall engage in the practice of registered nursing in California for a minimum of 24
25 hours per week for 6 consecutive months or as determined by the Board.

26 For purposes of compliance with the section, "engage in the practice of registered nursing"
27 may include, when approved by the Board, volunteer work as a registered nurse, or work in any
28 non-direct patient care position that requires licensure as a registered nurse.

1 The Board may require that advanced practice nurses engage in advanced practice nursing
2 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

3 If Respondent has not complied with this condition during the probationary term, and
4 Respondent has presented sufficient documentation of her good faith efforts to comply with this
5 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
6 extension of Respondent's probation period up to one year without further hearing in order to
7 comply with this condition. During the one year extension, all original conditions of probation
8 shall apply.

9 **7. Employment Approval and Reporting Requirements.** Respondent shall
10 obtain prior approval from the Board before commencing or continuing any employment, paid or
11 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
12 performance evaluations and other employment related reports as a registered nurse upon request
13 of the Board.

14 Respondent shall provide a copy of this Decision to her employer and immediate
15 supervisors prior to commencement of any nursing or other health care related employment.

16 In addition to the above, Respondent shall notify the Board in writing within seventy-two
17 (72) hours after she obtains any nursing or other health care related employment. Respondent
18 shall notify the Board in writing within seventy-two (72) hours after she is terminated or
19 separated, regardless of cause, from any nursing, or other health care related employment with a
20 full explanation of the circumstances surrounding the termination or separation.

21 **8. Supervision.** Respondent shall obtain prior approval from the Board
22 regarding Respondent's level of supervision and/or collaboration before commencing or
23 continuing any employment as a registered nurse, or education and training that includes patient
24 care.

25 Respondent shall practice only under the direct supervision of a registered nurse in good
26 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods
27 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
28 approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

(a) Maximum - The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.

(b) Moderate - The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours Respondent works.

(c) Minimum - The individual providing supervision and/or collaboration has person-to-person communication with Respondent at least twice during each shift worked.

(d) Home Health Care - If Respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with Respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by Respondent with or without Respondent present.

9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse, or for an in-house nursing pool.

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been approved by the Board. Respondent shall not work in any other registered nursing occupation where home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict Respondent from supervising licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined

1 worksite(s) and shall not work in a float capacity.

2 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
3 request documentation to determine whether there should be restrictions on the hours of work.

4 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall
5 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later
6 than six months prior to the end of her probationary term.

7 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
8 Respondent shall submit to the Board the original transcripts or certificates of completion for the
9 above required course(s). The Board shall return the original documents to Respondent after
10 photocopying them for its records.

11 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with
12 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
13 amount of \$1,705.00. Respondent shall be permitted to pay these costs in a payment plan
14 approved by the Board, with payments to be completed no later than three months prior to the end
15 of the probation term.

16 If Respondent has not complied with this condition during the probationary term, and
17 Respondent has presented sufficient documentation of her good faith efforts to comply with this
18 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
19 extension of Respondent's probation period up to one year without further hearing in order to
20 comply with this condition. During the one year extension, all original conditions of probation
21 will apply.

22 12. **Violation of Probation.** If Respondent violates the conditions of her
23 probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside
24 the stay order and impose the stayed discipline (revocation/suspension) of Respondent's license.

25 If during the period of probation, an accusation or petition to revoke probation has been
26 filed against Respondent's license or the Attorney General's Office has been requested to prepare
27 an accusation or petition to revoke probation against Respondent's license, the probationary
28 period shall automatically be extended and shall not expire until the accusation or petition has

1 been acted upon by the Board..

2 13. **License Surrender.** During Respondent's term of probation, if she ceases
3 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
4 probation, Respondent may surrender her license to the Board. The Board reserves the right to
5 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
6 take any other action deemed appropriate and reasonable under the circumstances, without further
7 hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent will no
8 longer be subject to the conditions of probation.

9 Surrender of Respondent's license shall be considered a disciplinary action and shall
10 become a part of Respondent's license history with the Board. A registered nurse whose license
11 has been surrendered may petition the Board for reinstatement no-sooner than the following
12 minimum periods from the effective date of the disciplinary decision:

13 (1) Two years for reinstatement of a license that was surrendered for any reason other
14 than a mental or physical illness; or

15 (2) One year for a license surrendered for a mental or physical illness.

16 14. **Physical Examination.** Within 45 days of the effective date of this
17 Decision, Respondent, at her expense, shall have a licensed physician, nurse practitioner, or
18 physician assistant, who is approved by the Board before the assessment is performed, submit an
19 assessment of the Respondent's physical condition and capability to perform the duties of a
20 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If
21 medically determined, a recommended treatment program will be instituted and followed by the
22 Respondent with the physician, nurse practitioner, or physician assistant providing written reports
23 to the Board on forms provided by the Board.

24 If Respondent is determined to be unable to practice safely as a registered nurse, the
25 licensed physician, nurse practitioner, or physician assistant making this determination shall
26 immediately notify the Board and Respondent by telephone, and the Board shall request that the
27 Attorney General's office prepare an accusation or petition to revoke probation. Respondent shall
28 immediately cease practice and shall not resume practice until notified by the Board. During this

1 period of suspension, Respondent shall not engage in any practice for which a license issued by
2 the Board is required until the Board has notified Respondent that a medical determination
3 permits Respondent to resume practice. This period of suspension will not apply to the reduction
4 of this probationary time period.

5 If Respondent fails to have the above assessment submitted to the Board within the 45-day
6 requirement, Respondent shall immediately cease practice and shall not resume practice until
7 notified by the Board. This period of suspension will not apply to the reduction of this
8 probationary time period. The Board may waive or postpone this suspension only if significant,
9 documented evidence of mitigation is provided. Such evidence must establish good faith efforts
10 by Respondent to obtain the assessment, and a specific date for compliance must be provided.
11 Only one such waiver or extension may be permitted.

12 15. **Participate in Treatment/Rehabilitation Program for Chemical**
13 **Dependence.** Based on Board recommendation, each week Respondent shall be required to
14 attend at least one, but no more than five 12-step recovery meetings or equivalent (e.g., Narcotics
15 Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved and directed by
16 the Board. If a nurse support group is not available, an additional 12-step meeting or equivalent
17 shall be added. Respondent shall submit dated and signed documentation confirming such
18 attendance to the Board during the entire period of probation. Respondent shall continue with the
19 recovery plan recommended by the treatment/rehabilitation program or a licensed mental health
20 examiner and/or other ongoing recovery groups.

21 16. **Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent
22 shall completely abstain from the possession, injection or consumption by any route of all
23 controlled substances and all psychotropic (mood altering) drugs, including alcohol, except when
24 the same are ordered by a health care professional legally authorized to do so as part of
25 documented medical treatment. Respondent shall have sent to the Board, in writing and within
26 fourteen (14) days, by the prescribing health professional, a report identifying the medication,
27 dosage, the date the medication was prescribed, the Respondent's prognosis, the date the
28 medication will no longer be required, and the effect on the recovery plan, if appropriate.

1 Respondent shall identify for the Board a single physician, nurse practitioner or physician
2 assistant who shall be aware of Respondent's history of substance abuse and will coordinate and
3 monitor any prescriptions for Respondent for dangerous drugs, controlled substances or mood-
4 altering drugs. The coordinating physician, nurse practitioner, or physician assistant shall report
5 to the Board on a quarterly basis Respondent's compliance with this condition. If any substances
6 considered addictive have been prescribed, the report shall identify a program for the time limited
7 use of any such substances.

8 The Board may require the single coordinating physician, nurse practitioner, or physician
9 assistant to be a specialist in addictive medicine, or to consult with a specialist in addictive
10 medicine.

11 17. Submit to Tests and Samples. Respondent, at her expense, shall
12 participate in a random, biological fluid testing or a drug screening program which the Board
13 approves. The length of time and frequency will be subject to approval by the Board.
14 Respondent is responsible for keeping the Board informed of Respondent's current telephone
15 number at all times. Respondent shall also ensure that messages may be left at the telephone
16 number when she is not available and ensure that reports are submitted directly by the testing
17 agency to the Board, as directed. Any confirmed positive finding shall be reported immediately
18 to the Board by the program and Respondent shall be considered in violation of probation.

19 In addition, Respondent, at any time during the period of probation, shall fully cooperate
20 with the Board or any of its representatives, and shall, when requested, submit to such tests and
21 samples as the Board or its representatives may require for the detection of alcohol, narcotics,
22 hypnotics, dangerous drugs, or other controlled substances.

23 If Respondent has a positive drug screen for any substance not legally authorized and not
24 reported to the coordinating physician, nurse practitioner, or physician assistant, and the Board
25 files a petition to revoke probation or an accusation, the Board may suspend Respondent from
26 practice pending the final decision on the petition to revoke probation or the accusation. This
27 period of suspension will not apply to the reduction of this probationary time period.

28 If Respondent fails to participate in a random, biological fluid testing or drug screening

1 program within the specified time frame, Respondent shall immediately cease practice and shall
2 not resume practice until notified by the Board. After taking into account documented evidence
3 of mitigation, if the Board files a petition to revoke probation or an accusation, the Board may
4 suspend Respondent from practice pending the final decision on the petition to revoke probation
5 or the accusation. This period of suspension will not apply to the reduction of this probationary
6 time period.

7 18. **Mental Health Examination.** Respondent shall, within 45 days of the
8 effective date of this Decision, have a mental health examination including psychological testing
9 as appropriate to determine her capability to perform the duties of a registered nurse. The
10 examination will be performed by a psychiatrist, psychologist or other licensed mental health
11 practitioner approved by the Board. The examining mental health practitioner will submit a
12 written report of that assessment and recommendations to the Board. All costs are the
13 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a
14 result of the mental health examination will be instituted and followed by Respondent.

15 If Respondent is determined to be unable to practice safely as a registered nurse, the
16 licensed mental health care practitioner making this determination shall immediately notify the
17 Board and Respondent by telephone, and the Board shall request that the Attorney General's
18 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease
19 practice and may not resume practice until notified by the Board. During this period of
20 suspension, Respondent shall not engage in any practice for which a license issued by the Board
21 is required, until the Board has notified Respondent that a mental health determination permits
22 Respondent to resume practice. This period of suspension will not apply to the reduction of this
23 probationary time period.

24 If Respondent fails to have the above assessment submitted to the Board within the 45-day
25 requirement, Respondent shall immediately cease practice and shall not resume practice until
26 notified by the Board. This period of suspension will not apply to the reduction of this
27 probationary time period. The Board may waive or postpone this suspension only if significant,
28 documented evidence of mitigation is provided. Such evidence must establish good faith efforts

1 by Respondent to obtain the assessment; and a specific date for compliance must be provided.

2 Only one such waiver or extension may be permitted.

3 19. **Therapy or Counseling Program.** Respondent, at her expense, shall
4 participate in an on-going counseling program until such time as the Board releases her from this
5 requirement and only upon the recommendation of the counselor. Written progress reports from
6 the counselor will be required at various intervals.

7
8 ACCEPTANCE

9 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
10 stipulation and the effect it will have on my Registered Nurse License. I enter into this
11 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
12 to be bound by the Decision and Order of the Board of Registered Nursing.

13
14 DATED: 6/13/11

Glynn Marie Peake
15 GLYNN MARIE ZUANICH,
16 aka GLYNN MARIE PEAKE
17 Respondent
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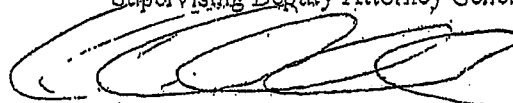
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 6/13/11

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
KAREN B. CHAPPELLE
Supervising Deputy Attorney General



GEOFFREY WARD
Deputy Attorney General
Attorneys for Complainant

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Exhibit A
Board of Registered Nursing
Accusation Number 2011-88

1 EDMUND G. BROWN JR.
Attorney General of California
2 KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3 GEOFFREY WARD
Deputy Attorney General
4 State Bar No. 246437
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2660
6 Facsimile: (213) 897-2804
Attorneys for Complainant

7
8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No.

13 **GLYNN MARIE ZUANICH, aka GLYNN**
14 **MARIE PEAKE**

A C C U S A T I O N

15 2126 Mt. Shasta Drive
16 San Pedro, CA 90732

17 Registered Nurse License No. 452568

18 Respondent.

19 Complainant alleges:

PARTIES

20 1. Louise R. Bailey, M.Ed., R.N. ("Complainant") brings this Accusation solely in her
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing.

22 2. On or about March 31, 1990, the Board of Registered Nursing issued Number 452568
23 to Glynn Marie Zuanich, aka Glynn Marie Peake ("Respondent"). The Registered Nurse License
24 was in full force and effect at all times relevant to the charges brought herein and will expire on
25 March 31, 2012, unless renewed.

26 ///

27 ///

28 ///

1 administer to another, any controlled substance as defined in Division 10 (commencing with
2 Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as
3 defined in Section 4022.

4 ...
5 (f) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any
6 hospital, patient, or other record pertaining to the substances described in subdivision (a) of this
7 section."

8 7. Section 4022 of the Code defines "dangerous drug" as "any drug or device unsafe for
9 self-use in humans or animals," including "(a) [a]ny drug that bears the legend: 'Caution: federal
10 law prohibits dispensing without prescription,' 'Rx only,' or words of similar import" as well as
11 "(c) [a]ny other drug or device that by federal or state law can be lawfully dispensed only on
12 prescription..."

13 COST RECOVERY

14 8. Section 125.3 of the Code provides, in pertinent part, that the Board, Registrar, or
15 Director may request the administrative law judge to direct a licensee found to have committed a
16 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
17 investigation and enforcement of the case.

18 FIRST CAUSE FOR DISCIPLINE

19 (Disciplinary Action by the Colorado Board of Nursing)

20 9. Respondent is subject to disciplinary action under Section 2761, subdivision (a)(4),
21 because the Colorado State Board of Nursing ("Colorado Board") revoked her license to practice
22 nursing in Colorado. The circumstances of the Colorado Board's disciplinary action are as
23 follows:

24 10. On or about September 30, 1998, pursuant to a Stipulation and Order ("Stipulation")
25 in the disciplinary matter entitled, *In the Matter of Disciplinary Proceedings Regarding the*
26 *License to Practice Professional Nursing in the State of Colorado of Glynn M. Peake, R.N.,*
27 *License No. 109849*, the Colorado Board accepted Respondent's relinquishment of her nursing
28 license. This acceptance had the full force and effect of a revocation ordered by the Board.

1 11. On or about April 29, 1999, based upon the conduct alleged in the Stipulation,
2 Respondent and the Colorado Board consented to the entry of an order for injunction and
3 judgment by the District Court of Arapahoe County, Colorado. The District Court order and
4 judgment enjoined Respondent from practicing in Colorado as a professional nurse, practical
5 nurse, or a certified nurse aide.

6 12. In the Stipulation, the Colorado Board accepted the relinquishment of Respondent's
7 nursing license based upon allegations that Respondent had failed to comply with a diversion
8 program, had stolen medication, had falsified records, and had failed to report to work as follows:

9 a. After signing a contract with the "Impaired Professional Diversion Program" in
10 August 1997, Respondent allegedly failed to comply with the terms of that
11 contract, including failing to submit records of attendance at 12-Step programs, as
12 well as failing to submit reports on urine monitoring, therapist meetings, 12-Step
13 program sponsors, and self-status reports.

14 b. While employed as a professional nurse at Columbia Medical Center of Aurora,
15 in Aurora, Colorado, Respondent allegedly took 10 vials of Nubain (nalbuphine
16 hydrochloride), a synthetic opioid equivalent to morphine. Respondent allegedly
17 obtained the Nubain by accessing the Pyxis medication system to withdraw
18 Fleet's Enema, which was not needed or used by any of the patients under her
19 supervision, and then withdrawing Nubain instead.

20 c. When her supervisor scheduled a meeting with Respondent to discuss the missing
21 Nubain, Respondent failed to appear at the meeting. She subsequently stopped
22 showing up for work altogether, providing no notice or explanation to her
23 employer.

24 13. Based upon these allegations, the Colorado Board accepted the relinquishment of
25 Respondent's nursing license in September 1998. The Arapahoe County District court further
26 enjoined Respondent from practicing nursing in its April 1999 order for injunction and final
27 judgment.

14. Under Section 2761, subdivision (a)(4), of the Code, the revocation of Respondent's nursing license by Colorado is grounds for the Board to take disciplinary action.

SECOND CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

15. By committing the acts set forth in particularity in paragraphs 9 through 14, above, Respondent is subject to disciplinary action on the grounds of unprofessional conduct pursuant to Section 2761, subdivision (a), of the Code.

THIRD CAUSE FOR DISCIPLINE

(Drug-Related Transgressions)

16. By committing the acts set forth in particularity in paragraphs 9 through 14, above, Respondent is subject to disciplinary action under Section 2762 of the Code, because she obtained nalbuphine hydrochloride without a prescription, and did so by falsifying records. Although nalbuphine hydrochloride is not on the state or federal list of controlled substances, it cannot be dispensed without a prescription, making it a "dangerous drug" under Section 4022 of the Code. As a result, obtaining it without a prescription is a violation of Section 2762, subdivision (a), and falsifying records pertaining to it is a violation of Section 2762, subdivision (f). By allegedly using false entries for Fleet's Enema to access the Pyxis machine in order to obtain nalbuphine hydrochloride, Respondent is subject to disciplinary action under both subdivisions (a) and (f) of Section 2762.

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1. Revoking or suspending Registered Nurse License Number 452568, issued to Glynn Marie Zuanich, aka Glynn Marie Peake;
2. Ordering Glynn Marie Zuanich aka Glynn Marie Peake to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code Section 125.3;
3. Taking such other and further action as deemed necessary and proper.

August 4, 2010

LOUISE R. BAILEY, M.ED., R.N.
Interim Executive Officer
Board of Registered Nursing
State of California
Complainant

6

Exhibit B

Petition to Revoke Probation Case No. 2011-8

1 KAMALA D. HARRIS
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2 KAREN B. CHAPPELLE
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E-mail: Geoffrey.Ward@doj.ca.gov
7 Attorneys for Complainant

8 BEFORE THE
9 BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Petition to Revoke
12 Probation Against,

Case No.

13 GLYNN MARIE PEAKE, AKA GLYNN
MARIE ZUANICH
14 2126 Mt. Shasta Drive
San Pedro, CA 90732
15 Registered Nurse License No. 452568

PETITION TO REVOKE PROBATION

16 Respondent.

17 Complainant alleges:

18 PARTIES

19 1. Louise R. Bailey, M.Ed., R.N. (Complainant) brings this Petition to Revoke Probation
20 solely in her official capacity as the Executive Officer of the Board of Registered Nursing,
21 Department of Consumer Affairs.

22 2. On or about March 31, 1990, the Board of Registered Nursing issued Registered
23 Nurse License Number 452568 to Glynn Marie Peake, aka Glynn Marie Zuanich (Respondent).
24 The Registered Nurse License was in effect at all times relevant to the charges brought herein and
25 will expire on March 31, 2012, unless renewed.

26 3. In a disciplinary action entitled "In the Matter of Accusation Against In the Matter of
27 Glynn Marie Zuanich aka Glynn Marie Peake," Case No. 2011-88, the Board of Registered
28 Nursing, issued a decision, effective September 21, 2011, in which Respondent's Registered

1 Nurse License was revoked. However, the revocation was stayed and Respondent's Registered
2 Nurse License was placed on probation for a period of three (3) years with certain terms and
3 conditions. A copy of that decision and order is attached as Exhibit A and is incorporated by
4 reference.

5 JURISDICTION

6 4. This Petition to Revoke Probation is brought before the Board of Registered Nursing
7 (Board), Department of Consumer Affairs, under the authority of the following laws. All section
8 references are to the Business and Professions Code unless otherwise indicated.

9 5. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part,
10 that the Board may discipline any licensee, including a licensee holding a temporary or an
11 inactive license, for any reason provided in Article 3 (commencing with section 2750) of the
12 Nursing Practice Act.

13 6. Section 2764 of the Code provides, in pertinent part, that the expiration of a license
14 shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the
15 licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the
16 Code, the Board may renew an expired license at any time within eight years after the expiration.

17 FIRST CAUSE TO REVOKE PROBATION

18 (Failure to Abstain from Consumption of Alcohol)

19 7. Respondent's probation is subject to revocation because she failed to comply with the
20 terms and conditions of the disciplinary order imposing probationary terms and conditions on her
21 license when she failed to abstain from the consumption of alcohol. The facts and circumstances
22 regarding this violation are as follows:

23 8. At all times after the effective date of Respondent's probation, Condition 2 of the
24 Board's disciplinary order stated:

25 "Comply with the Board's Probation Program. Respondent shall fully
26 comply with the conditions of the Probation Program established by the Board and
27 cooperate with representatives of the Board in its monitoring and investigation of the
28 Respondent's compliance with the Board's Probation Program. Respondent shall
inform the Board in writing within no more than 15 days of any address change and
shall at all times maintain an active, current license status with the Board, including
during any period of suspension.

1 Upon successful completion of probation, Respondent's license shall be
2 fully restored."

3 9. At all times after the effective date of Respondent's probation, Condition 12 of the
4 Board's disciplinary order stated;

5 "Violation of Probation. If Respondent violates the conditions of her
6 probation, the Board after giving Respondent notice and an opportunity to be heard,
7 may set aside the stay order and impose the stayed discipline (revocation/suspension)
8 of Respondent's license.

9 If during the period of probation, an accusation or petition to revoke
10 probation has been filed against Respondent's license or the Attorney General's
11 Office has been requested to prepare an accusation or petition to revoke probation
12 against Respondent's license, the probationary period shall automatically be extended
13 and shall not expire until the accusation or petition has been acted upon by the
14 Board."

15 10. At all times after the effective date of Respondent's probation, Condition 16 of the
16 Board's disciplinary order stated in relevant part:

17 "Abstain from Use of Psychotropic (Mood-Altering) Drugs.
18 Respondent shall completely abstain from the possession, injection or consumption
19 by any route of all controlled substances and all psychotropic (mood altering) drugs,
20 including alcohol, except when the same are ordered by a health care professional
21 legally authorized to do so as part of her medical treatment."

22 11. At all times after the effective date of Respondent's probation, Condition 17 of the
23 Board's disciplinary order stated in relevant part:

24 "Submit to Tests and Samples. Respondent, at her expense, shall
25 participate in a random, biological fluid testing or a drug screening program which
26 the Board approves. The length of time and frequency will be subject to approval by
27 the Board. Respondent is responsible for keeping the Board informed of
28 Respondent's current telephone number at all times. Respondent shall also ensure
that messages may be left at the telephone number when she is not available and
ensure that reports are submitted directly by the testing agency to the Board, as
directed. Any confirmed positive finding shall be reported immediately to the Board
by the program and Respondent shall be considered in violation of probation."

12. On or about October 10, 2011 at a random biological fluid test, Respondent tested
positive for alcohol consumption, showing that she had failed to abstain from alcohol
consumption during the period of her probation. The consumption of alcohol violated Condition
16 of the disciplinary order, which subjects her license to the previously stayed revocation under
Conditions 2 and 12 of the disciplinary order.

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